

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CASE NO. 03-12372 NMG

BARBARA TORRISI)
Plaintiff,)
)
V.)
)
METROPOLITAN LIFE)
INSURANCE COMPANY)
Defendant.)
)

STIPULATION

Plaintiff Barbara Torrasi ("Torrasi") and defendant Metropolitan Life Insurance Company ("MetLife"), by their counsel, stipulate and agree as follows.

1. This stipulation shall govern the following proprietary and confidential documents produced by MetLife, the claims administrator for the Sears Roebuck and Company Long-Term Disability Plan: MetLife's Claims Management Guidelines or any section thereof ("CMG Documents").
2. Absent further written agreement by Torrasi and MetLife, or absent further court order, Torrasi and her counsel, Stephen L. Raymond, shall not disclose the CMG Documents, or any information contained therein, to any other person. The CMG Documents shall not be used for any purpose other than in connection with this action. All copies of the CMG Documents shall remain in the office of Attorney Raymond.
3. If Torrasi proposes to include any portion of the CMG Documents, or any reference to the contents of the CMG Documents, in any papers filed in court, she shall provide at least seven calendar days notice to MetLife's counsel, so that MetLife's counsel can discuss mutually-agreeable safeguards with Torrasi's counsel or, if necessary, seek a court order.

4. Within seven days of the conclusion of this litigation (i.e., the expiration of the appeals period after a final judgment, or the conclusion of any appeal affirming a final judgment), Torrasi and her counsel shall either (1) return all copies (including extracts or summaries) of the CMG Documents to counsel for MetLife, or (2) certify under the penalties of perjury that all such copies, extracts, and summaries have been destroyed.
5. This stipulation, and any order issued pursuant to this stipulation, shall continue even after this action has been terminated.
6. The parties will submit a joint motion requesting that the court enter an order adopting the provisions of this stipulation.

BARBARA TORRISI

By her attorney,

/s/ Stephen L. Raymond (JLM)

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METROPOLITAN LIFE INSURANCE
COMPANY,

By its attorneys,

/s/ Johanna L. Matloff

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Dated: May 31, 2005

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